

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

In re §
§
PASO DEL NORTE MATERIALS, LLC, § Case No. 23-30252-HCM-11
§
Debtor. §

REQUEST FOR VALUATION WITNESS TO APPEAR
BY WEBEX OR TELEPHONICALLY

TO THE HONORABLE H. CHRISTOPHER MOTT, UNITED STATES BANKRUPTCY JUDGE:

Now comes PASO DEL NORTE MATERIALS, LLC and through its attorney undersigned files this Request for Valuation Witness to Appear by WebEx or Telephonically, and would respectfully show:

1.

Set for Wednesday, July 26, 2023 at 1:00 p.m. (MT) is WALLWORK FINANCIAL's Motion for Relief from Stay (Doc. #91).

2.

The Debtor requests that SEAN KELLEY, a Certified Equipment Appraiser whom it has applied to employ in these proceedings, be permitted to appear telephonically so that he may serve as an expert witness as to the valuation of the equipment secured by WALLWORK FINANCIAL.

3.

It will be expensive and time-consuming for SEAN KELLEY to travel round-trip from his business address in Tomball, Texas to El Paso, Texas to attend in person the hearing upon this Motion for Relief from Stay.

4.

The undersigned attorney will be responsible for informing Mr. KELLEY on how he can call into the Court for that hearing or appear via Web-Ex, if he is allowed to appear either way.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this Request for Valuation Witness to Appear via Web-Ex or Telephonically be granted.

Respectfully submitted this 20th day of July, 2023.

/s/ 
E.P. BUD KIRK
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Attorney for Debtor-in-Possession

CERTIFICATE OF SERVICE

I do hereby certify that on the 20th day of July, 2023, I did cause a copy of the following Request for Valuation Witness to Appear Telephonically to be mailed by postage pre-paid U.S. Mail to U.S. Trustee, 615 E. Houston St., Ste. 533, San Antonio, TX 78205-1539; to Paso Del Norte Materials, LLC, 8000 Escobar, El Paso, TX 79907; to Wallwork Financial, c/o Christopher V. Arisco, 420 Throckmorton Street, Suite 1210, Fort Worth, Texas 76102; to Wallwork Financial, c/o Kelsey N. Linendoll, 420 Throckmorton Street, Suite 1210, Forth Worth, Texas 76102.

/s/ 
E.P. BUD KIRK

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